

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Chapter 11

ROBERT P. RUGGIERO SR

DEBTOR

Case# 25-70416-las

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**NOTICE OF DEBTOR'S MOTION FOR AN ORDER ENLARGING THE DEBTOR'S
EXCLUSIVE PERIOD TO CONFIRM ITS CHAPTER 11 PLAN
TOGETHER WITH RELATED RELIEF**

PLEASE TAKE NOTICE, that upon the Application dated July 21, 2025 (the “Application”) of Robert P. Ruggiero Sr (“Debtor”), the Debtor and Debtor-in-Possession herein, a motion will be made before the Honorable Louis A. Scarcella, United States Bankruptcy Judge, in his courtroom at the United States Bankruptcy Court, 290 Federal Plaza, Room 970, Central Islip, New York 11722, on the 4th day of September 2025, at 10:00 a.m. or as soon thereafter as counsel may be heard, seeking an order: pursuant to §1121(d) extending the Debtor’s exclusive period to confirm its Plan of Reorganization to December 31, 2025 together with such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE, that a copy of the complete Application is on file with the Bankruptcy Court at the address set forth below and may be reviewed during the Court’s regular business hours or may be obtained by contacting Debtor’s counsel, the Law Office of Richard S. Feinsilver, Esq., One Old Country Road, Suite 347, Carle Place, New York 11514, telephone 516-873-6330, Attention: Richard S. Feinsilver, Esq., and requesting same.

PLEASE TAKE FURTHER NOTICE, that, the hearing **SHALL be held in person** unless an appearance by other means is approved in advance by the Court. Those intending to

appear at the hearing must register to appear no later than two days prior to the hearing.

Instructions for registration can be found at <https://ecf.nyeb.uscourts.gov/>.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Application must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court, and must be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's Electronic Court Filing System and by all other parties in interest on a 3.5 disk, preferably in Portable Document Format ("PDF"), Microsoft Word or other Windows-based word processing format with a copy to be served upon the Law Offices of Richard S. Feinsilver, Esq., One Old Country Road, Suite 347, Carle Place, New York 11514, telephone 516-873-6330, Attention: Richard S. Feinsilver, Esq., attorney for the Debtor, and the Office of the United States Trustee, 560 Federal Plaza, Central Islip New York 11722 Attn. Christine H Black, Esq., so as to be received not later than 4:00 p.m. seven days prior to the hearing date.

PLEASE TAKE FURTHER NOTICE that the hearing on the motion may be adjourned without notice other than an announcement in open Court.

Dated: Carle Place, New York
July 21, 2025

By /s/ Richard S. Feinsilver
Richard S. Feinsilver, Esq.
Attorney for Debtor and Debtor in Possession
One Old Country Road, Suite 347
Carle Place, New York 11514
516-873-6330

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re: Chapter 11

ROBERT P. RUGGIERO SR Case No. 25-70416-las

Debtor. Hon. Louis A. Scarcella
-----X

MOTION BY DEBTOR TO EXTEND THE TIME TO CONFIRM PLAN OF
REORGANIZATION PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE

TO: THE HONORABLE Louis A. Scarcella, UNITED STATES BANKRUPTCY
JUDGE

ROBERT P. RUGGIERO SR. (the "Debtor"), by his attorney,
Richard S. Feinsilver, Esq., respectfully requests that the Court
extend the time to obtain confirmation of its last filed plan of
reorganization (the "Motion"), and represents and states as
follows:

BACKGROUND AND APPLICABLE LAW

1. On January 31, 2025 (the "Filing Date"), the Debtor
filed a voluntary bankruptcy petition under Chapter 11 of the
Bankruptcy Code.

2. The Debtor has continued in the possession of the
assets of its estate and in the operation of its affairs as a
debtor-in-possession. No Creditor's Committee has been appointed
in this case.

3. On July 7, 2025, the Debtor filed its initial
disclosure statement and plan outlining its exit strategy in this
Chapter 11 case.

4. On July 11, 2025, an Order was entered by this Court
(ECF #52) extending the Debtor's exclusive period to confirm its

Plan of Reorganization to September 30, 2025.

5. For the reasons set forth below, the Debtor respectfully requests that the Court enter an Order extending the Debtor's time to confirm the Plan (as it may be amended) to December 31, 2025, and that such Order be signed on or before September 30, 2025.

GROUND FOR RELIEF

6. The Debtor filed the instant case to stay enforcement proceedings initiated by the Internal Revenue Service ("IRS"), the New York State Department of Taxation and Finance ("NYS") and Plumbers Local Union No. 200 and its affiliates.

7. To date, the Debtor has fulfilled its administrative obligations in this Chapter 11 and is moving forward in its efforts to promulgate an amended Chapter 11 Plan which can be confirmed by this Court.

8. Toward that end, the bar date has passed. The IRS, NYS and Local 200, the debtor's principal creditors, have filed their respective proofs of claim and certain pending motions regarding some of these claims have been resolved.

9. The debtor, as the principal and responsible party of his former company, ARA Plumbing, Inc., a joint obligor on the debts owed to the IRS, NYS and Local 200, has identified a number of outstanding receivables of ARA that it believes are collectable in part or in whole. The collection of these receivables shall decrease the individual debtor's joint and several liability to its principal creditors and possibly increase the dividend which may be paid to the debtor's unsecured creditor base.

10. The subject receivables are not property of the debtor's estate pursuant to 11 U.S.C. Section 541. As such, any efforts to collect these receivables must be done outside of the purview of this Court on a parallel path to the prosecution of this case. While the debtor has opened discussions with Local 200 to work through various issues regarding the receivables, the debtor is confident that a portion of the ARA receivables may be recovered without the necessity of the retention of collection counsel as the debtor is negotiating a joint plan of attack counsel to Local 200.

11. Based upon the foregoing, the debtor does not believe that it will be able to proceed to the confirmation of its last filed Chapter 11 Plan by September 20, 2025, and shall require additional time to determine the viability of the collection of the subject receivables and the impact of such collections its last filed Chapter 11 Plan.

12. Based upon the foregoing, the Debtor verily believes that it has met the burden of proof that it is more likely than not to be able to proceed to confirmation of an amended plan within a reasonable period to time subsequent to September 30, 2025.

WHEREFORE, the Debtor respectfully requests that the Court (a) grant the Debtor's application in its entirety and enter an Order extending the Debtor's time to confirm the Plan (as same may be amended) to December 31, 2025 and (b) grant such other relief as may be just and necessary.

Dated: July 16, 2025
Carle Place, New York

s/Richard S. Feinsilver
Richard S. Feinsilver Esq.
One Old Country Road, S 347
Carle Place New York 11514
516-873-6330

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X

In re

ROBERT P RUGGIERO SR

Chapter 11

Case # 24-70416-las

Debtor

-----X

The undersigned attorney, duly admitted to practice before this Court, affirms the following to be true under the penalties of perjury:

That he is the attorney for the debtor in the instant case.

That on the 21st day of July 2025, your affiant served a true copy of the Notice of Motion and Supporting Documents in this action upon:

Office of the United States Trustee, Attn Christine Black Esq., 560 Federal Plaza, Central Islip NY 11722

US Attorney - EDNY, 610 Federal Plaza, Central Islip NY 11722

US DOJ - Tax Division, Tax Division 950 Pennsylvania Avenue NW Washington DC 20530

Annexed list of creditors and other parties to whom service is required pursuant to BR 2002 and the Local Rules of this Court

the address(es) designated by said attorney and party for that purpose by depositing a true copy of same to each attorney and party, enclosed in a post paid properly addressed wrapper, in an official depository, VIA FIRST CLASS MAIL, under the exclusive care and custody of the United States Postal Service within the State of New York.

Dated: July 21, 2025

Carle Place, New York

s/Richard S. Feinsilver

RICHARD S. FEINSILVER

Label Matrix for local noticing
0207-8
Case 8-25-70416-las
Eastern District of New York
Central Islip
Mon Jul 21 10:51:42 EDT 2025

Trustees of the International Training Fund
c/o Virginia & Ambinder, LLP
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Webster Bank, N.A.
c/o Goetz Platzer LLP
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New York, NY 10119-3100

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BEST EGG
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Bank of America, N.A.
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CARE CREDIT
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ORLANDO, FL 32896-0061

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CANON
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CASSONE LEASING
1950 LAKELAND AVE
RONKONKOMA, NY 11779-7400

CLINTON WELDING
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Plumbers Local Union No. 200 Pension Fund
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